

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK

Innovative Sports Management, Inc. d/b/a Integrated
Sports Media,

Plaintiff,

-against-

JESSENIA BURGOS, Individually, and as officer,
director, shareholder and/or principal of BARU CORP
d/b/a RIKO PERUVIAN,

and

BARU CORP d/b/a RIKO PERUVIAN,

Defendants.

PLAINTIFF’S MEMORANDUM ---
OF LAW IN SUPPORT OF
MOTION FOR DEFAULT
JUDGMENT

Civil Action No.
1:23-CV-00332-AMD-SJB

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